

REMARKS

Upon entry of the instant amendment, Claims 1-19 are pending. Claims 1 and 13 have been amended to more particularly point out Applicant's invention.

Claims 1-6 and 8-12 have been rejected under 35 U.S.C. §102(e) as being anticipated by Dulman, U.S. Patent No. 5,915,008 ("Dulman"). In order for there to be anticipation, each and every element of the claimed invention must be present in a single, prior reference. Applicant respectfully submits that the claimed invention is not taught, suggested, or implied by Dulman.

As described in the Specification, one aspect of the present invention relates to a system and method for network traffic management and, in particular, to intercepting *supplementary service* requests to a communications network and controlling resource for optimizing resource usage when setting up a call over the network. Such supplementary service requests include, for example, call forwarding requests.

In a particular embodiment of the invention, when a predetermined service command is placed to the communications system, the network services control system associated with a server can selectively intercept the command and reroute the call through the appropriate available servers, thereby ensuring termination to the correct user, reusing hard to get communications facilities and establishing the most optimal route to the call's final destination.

The network services control system is adapted to retrieve server identification data and to write statistical data in order to optimize network resources. A device/trunk handler is used to interface one or more incoming and outgoing signaling channels to the optimization system. A monitoring and statistics unit monitors the signaling channels when a call is made or is in progress. The server software controls the routing of the supplementary service in the network through one or more selected servers.

In contrast, as discussed in response to the previous Official Action, Dulman appears merely to relate to a standard telecommunications system that can

offer redirection features. More particularly, Dulman relates to a system for *provisioning network resources*. That is, Dulman provides a system that allows a user of customer premises equipment to change/add/delete AIN services, i.e., redefine the services which it can use by accessing a server and determining the destination of a service change request. Dulman does not appear to have anything to do with a user *using* the services, or how such services are, in fact, implemented at the server. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

Claim 7 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Dulman. Claim 7 depends from claim 5, which has been discussed above. Because Dulman does not teach, suggest, or imply the invention of the underlying claim, Applicant respectfully submits it also does not teach, suggest or imply the invention of the dependent claim. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection.

Claims 13-19 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Dulman in view of Lin et al., U.S. Patent No. 5,999,610 ("Lin"). Applicant respectfully submits that the claimed invention is not taught, suggested, or implied by Dulman or Lin, either singly or in combination. Dulman has been discussed above. Lin is relied on for allegedly teaching lists of servers' addresses. However, like Dulman, Lin does not appear to relate, inter alia, to "intercept[ing] and redirect[ing] supplementary service functions for handling to another server," as generally recited in the claims at issue. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

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For all of the above reasons, Applicants respectfully submit that the application is in condition for allowance, which allowance is earnestly solicited.

Respectfully requested,

A handwritten signature in cursive script that reads "Francis Montgomery".

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